

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

§

v.

§ Criminal No. 18-CR-368

CHRISTOPHER INCE

§

Defendant

§

**SUPPLEMENT TO UNITED STATES' OPPOSED MOTION TO
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States, by and through the undersigned counsel, respectfully submits this supplement to its opposed motion to exclude time under the Speedy Trial Act as to Defendant Christopher Ince (“Ince”). *See* Dkt. No. 628 (the “Motion”).

On April 25, the Government filed the Motion, requesting that the Court make a finding that the time between February 23, 2024, and May 3, 2024, is excluded under the Speedy Trial Act. *See* Dkt. No. at 628 at 5.

On April 30, 2024, the Court re-set the May 3 status conference for May 17, 2024. *See* Dkt. No. 636.

On May 1, 2024, the Government extended a formal plea offer to Ince and sent his counsel a proposed factual basis.

As of May 7, 2024, the parties are finalizing the plea agreement and plan to request a date for re-arraignment once it is signed.

Accordingly, the Government respectfully requests that the Court make a finding that time between February 23, 2024, and *May 17, 2024* is excluded under the Speedy Trial Act. The Government conferred with counsel for Ince, and they have withdrawn their opposition to the requested exclusion based on the state of plea negotiations.

Respectfully submitted,

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Dated: May 7, 2024

CERTIFICATE OF CONFERENCE

I hereby certify that on May 6, 2024, counsel for the United States consulted with counsel for Christopher Ince, who indicated they withdraw their opposition to the exclusion of time requested in the Motion (Dkt. No. 628) and this supplement based on the state of plea negotiations.

/s/ Nicholas K. Peone _____

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